

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LARRY FREUDENBERG, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

VS.

E*TRADE FINANCIAL CORPORATION,
MITCHELL H. CAPLAN and ROBERT J. SIMMONS

Defendants.

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)
) Civil No. 1:07-CV-08538-RWS
)
) CLASS ACTION
)
) ELECTRONICALLY FILED

**MOTION OF SKANDIA LIFE INSURANCE COMPANY LTD.
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF ITS SELECTION OF COUNSEL**

WILLIAM BOSTON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

-against-

E*TRADE FINANCIAL CORPORATION,
MITCHELL H. CAPLAN and ROBERT J.
SIMMONS,

Defendants.

Civil No. 1:07-CV-08808-RWS

CLASS ACTION

ROBERT D. THULMAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

-against-

E*TRADE FINANCIAL CORPORATION,
MITCHELL H. CAPLAN and ROBERT J.
SIMMONS,

Defendants.

Civil No. 1:07-CV-9651-RWS

CLASS ACTION

WENDY M. DAVIDSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

-against-

E*TRADE FINANCIAL CORPORATION,
MITCHELL H. CAPLAN and ROBERT J.
SIMMONS,

Defendants.

Civil No. 1:07-CV-10400-UA

CLASS ACTION

Institutional investor Skandia Life Insurance Company Ltd. (“Skandia”) hereby moves this Court for an Order:

1. Consolidating the above-captioned actions;
2. Appointing Skandia as Lead Plaintiff; and
3. Appointing the law firm of Motley Rice LLC to serve as Lead Counsel and Lieff, Cabraser, Heimann & Bernstein, LLP to serve as Liaison Counsel.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of James M. Hughes and the exhibits attached thereto, a proposed order, and all of the prior pleadings and proceedings had herein, and such other written and/or oral argument as may be presented to the Court.

Respectfully submitted this 3rd Day of December, 2007,

/s/ Daniel P. Chiplock

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[Proposed] Liaison Counsel

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and

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